

EXHIBIT F

Mobile Data Technologies

v.

Samsung*

Asserted U.S. Patent No. 9,032,039

“Method, apparatus and system for management of information content for enhanced accessibility over wireless communication networks”

Plaintiff's Claim Charts

Exhibit F

*Infringement by both Samsung defendants is evidenced in similarly, so that there is only one chart per patent as to the Complaint.

This claim chart is based on publicly available information regarding Defendants' products. Plaintiff will be seeking Defendants' internal documentation, including without limitation technical documentation such as schematics and datasheets as well as source, in discovery and therefore Plaintiff reserves the right to amend or further supplement this claim chart in accordance with the Court's schedule and local patent rules.

The term "Accused Products" herein means the same as in the Complaint, which is hereby incorporated by reference.

This claim chart specifically addresses infringement of Claim 18 ("Asserted Claim") of the '039 Patent by Defendants' Accused Products, and merely demonstrates one way in which Defendants infringe this claim of the '039 Patent.

These charts provide representative examples of direct infringement. To the extent that the charts reference Accused Products utilized by third-parties, Plaintiff's infringement assertion is still one of direct infringement because either a single Defendant is responsible for all accused functionality, or a plurality of Defendants constitute a joint enterprise that direct or control other Defendant(s)'s performance of the accused functionality. *See, e.g., Akamai Technologies, Inc. v. Limelight Networks, Inc.*, 797 F.3d 1020 (2015).

These charts show literal infringement. However, Plaintiff has additionally asserted infringement under the doctrine of equivalents. To the extent that the Accused Products are found to not literally infringe the express terms of the claims in suit, the elements of the Accused Products and the claimed elements of the patented invention are equivalent and Defendant infringements under the doctrine of equivalents. Plaintiff does not waive its assertions under the doctrine of equivalents.

Although Plaintiff will provide its damages information at the date set by the Court,, Plaintiff makes clear that it is also seeking damages based on convoyed sales.

Claim: 18 – Element (A)

A mobile device comprising:

at least one processing element comprising a processor coupled to a memory; and

at least one network interface;

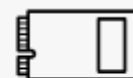
- The exemplary Samsung S24 smart phone has a processing element coupled to a memory, and at least one network interface.

Processor



Qualcomm Snapdragon 8 Gen 3 for Galaxy

Storage Options



128GB | 256GB

Cellular & Wireless

5G

The latest network technology with the power of 5G.³

<https://www.samsung.com/us/smartphones/galaxy-s24/buy/galaxy-s24-256gb-unlocked-sm-s921uzyexaa/>

Galaxy S24 Specifications

Date acquired: 2/9/2024

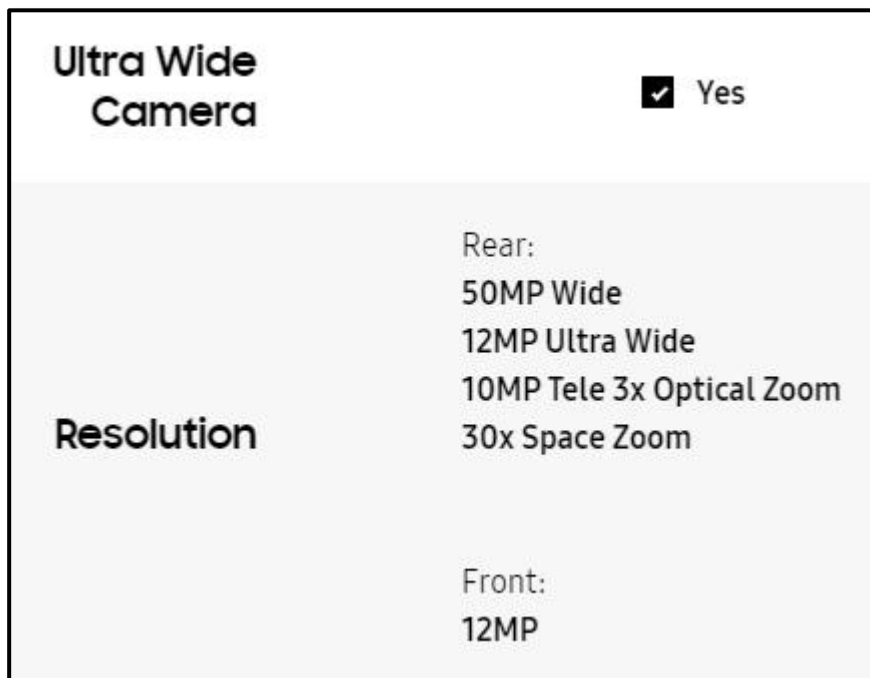
Claim 18, Element (A) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 18 – Element (B)

said at least one
processing element
being configured to:

capture content at the
mobile device;

- Samsung galaxy mobile devices (e.g. the Galaxy S24) have processors that are configured to capture content at the mobile device via at least one camera integrated into the device.



<https://www.samsung.com/us/smartphones/galaxy-s24/buy/galaxy-s24-256gb-unlocked-sm-s921uzyexaa/>

Galaxy S24 Specifications

Date acquired: 2/9/2024

Claim 18, Element (B) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 18 – Element (C1)

identify a previously established application-based information channel into which the captured content is to be inserted, the identified application-based information channel permitting interaction between a user of the mobile device and one or more additional users;

- The app “**Samsung Members**” comes pre-installed on the Samsung S24 phone.
- “Samsung Members” is a previously established Samsung-operated information channel where Samsung mobile device users can post and share content with each other.
- The Samsung Members app allows users to participate in the “Samsung Members Community.”

Galaxy Essentials | AR Zone | Bixby | Galaxy Shop | Galaxy Store | Galaxy Wearable | Game Launcher | PENUP | Samsung Free | Samsung Global Goals | **Samsung Members** | Samsung TV Plus | SmartThings | Tips | Calculator | Calendar | Clock | Contacts | Internet | Messages | My Files | Phone | Samsung Health | Samsung Notes | Samsung Pay

<https://ss7.vzw.com/is/content/VerizonWireless/samsung-galaxy-s21-userguide-01202021pdf>

Galaxy S24 User Manual

Date acquired: 2/9/2024

Unleash the power of synergy by joining the Samsung Members community that is open to all Samsung Galaxy users. Gain creative insights and share tips related to Samsung Galaxy ecosystem devices with supportive users and experts. Voice your opinions during Beta Tests or surveys, and actively participate in the open community. As Samsung Members Stars, you'll enjoy a range of benefits that every Samsung Galaxy fan dreams of. Gain exclusive opportunities to participate in diverse online and offline official events organized by Samsung Members.

[Visit Samsung Members Community ↗](#)

<https://www.samsung.com/global/galaxy/apps/samsung-members/>

Step into the Samsung Members Community

Date acquired: 2/9/2024

Welcome to the Samsung Members Community

Explore your new hub for all things Samsung and beyond. Connect with Samsung experts, super-fans, and other Community members for tips on features and how to get the most out of your Samsung product.

Search all content



MEMBERS	TOPICS	SOLUTIONS	ONLINE
18,883,993	21,172	16,035	98,364

https://us.community.samsung.com/t5/Samsung-Community/ct-p/us?page=1&tab=recent_topics

Welcome to the Samsung Members Community

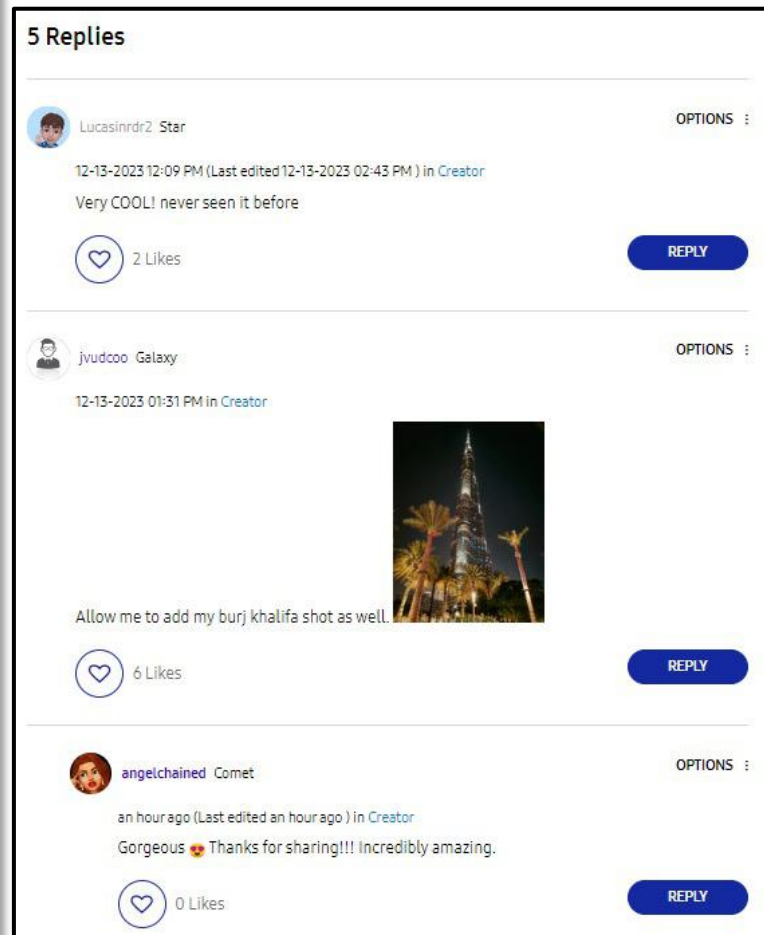
Date acquired: 2/12/2024

Claim 18, Element (C1) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 18 – Element (C2)

identify a previously established application-based information channel into which the captured content is to be inserted, **the identified application-based information channel permitting interaction between a user of the mobile device and one or more additional users;**

- The “Samsung Members Community” is an application-based information channel that allows different users of Galaxy mobile devices to interact via commentary and posting of media.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

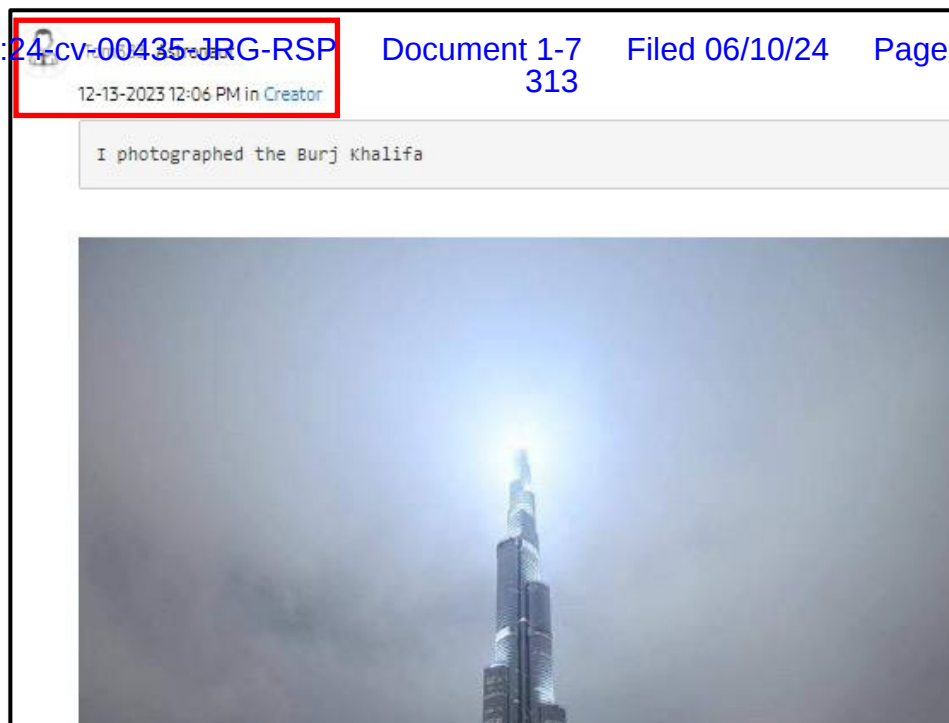
Date acquired: 2/12/2024

Claim 18, Element (C2) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 18 – Element (D)

determine information associated with at least one wireless networking functionality of the mobile device;

- The processor is configured to determine information associated with at least one messaging action implementable over a wireless network.
- For example, the processor in a Galaxy mobile phone can determine information (e.g. username, date, time, Group) that is associated with a messaging action performed by a user (Tom383) while messaging other users via the Samsung Members Community.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

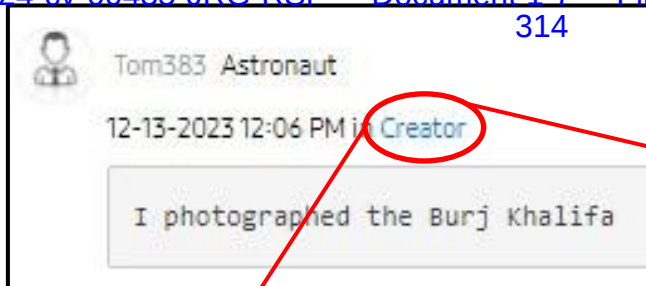
Original topic: Burj Khalifa

Date acquired: 2/12/2024

Advantageously, the information content of a given mobile site generated in the system 10 may be configured so as to integrate therewith information associated with at least one wireless networking functionality of the wireless network 12. This information may be determinable based at least in part on one or more parameters associated with the above-noted mobile information channels or M-channels. Examples of such information include information specifying at least one messaging action implementable over the wireless network, information specifying at least one collaboration action implementable over the wireless network, and information specifying at least one location-based service action implementable over the wireless network. Other types of information associated with wireless networking functionalities may also or alternatively be used.

Claim 18, Element (D) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 18 – Element (E)



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Original topic: Samsung Creator: Guidelines

(Topic created: 02-14-2019 01:17 PM) 39866 Views



SamsungAlix Comet

OPTIONS

02-14-2019 01:17 PM (Last edited 02-14-2019 01:19 PM) in [Creator](#)

Welcome all creators near and far! This platform is for you to share your Galaxy-created art, learn tips and tricks from other users, and share your Galaxy knowledge with other creators. We invite all types of collaboration and are here to help.

Few Do's and Don'ts to help all of us:

- DO:
 - When sharing your work, try to provide the following information in this format: [DEVICE/MODEL] [FEATURE/APP/ACCESSORY USED] [LOCATION] [CATEGORY OF ART]
 - E.g. Galaxy Note9 – Live Focus and Snapseed with a gimbal - Brooklyn, NY- Animal Photography

<https://us.community.samsung.com/t5/Creator/Samsung-Creator-Guidelines/m-p/459827#M4>

Original topic: Samsung Creator: Guidelines

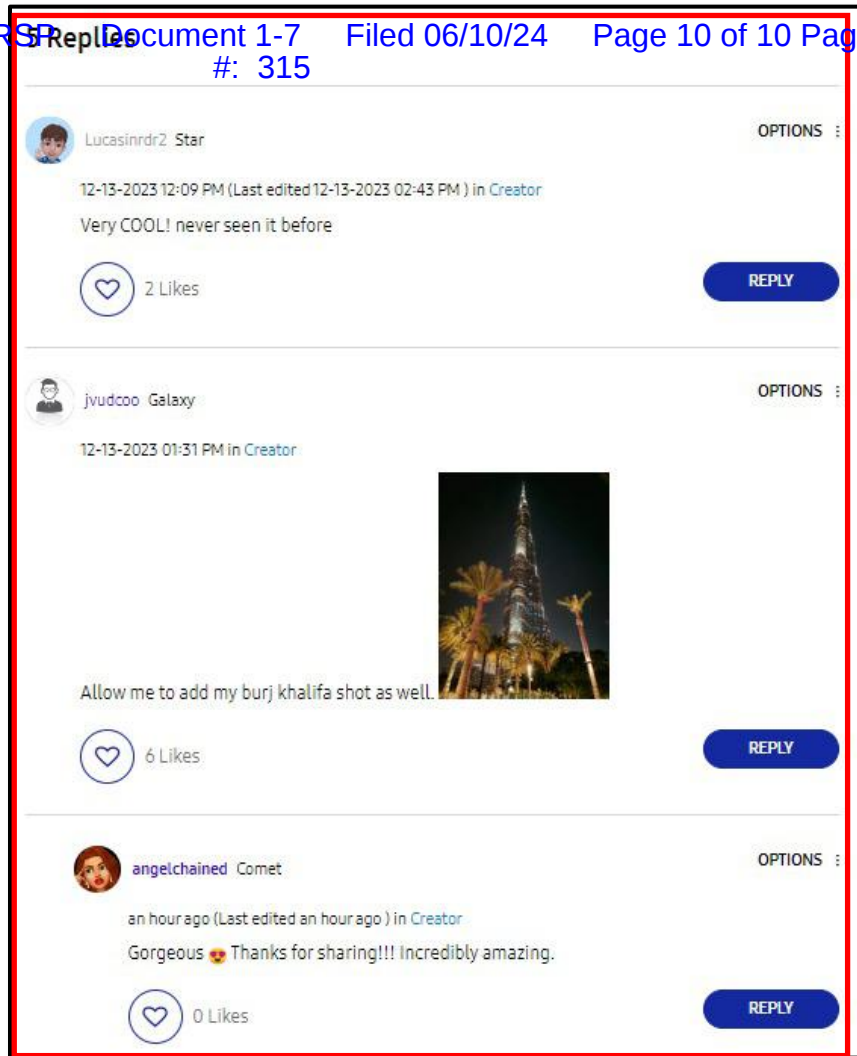
Date acquired: 2/12/2024

Claim 18, Element (E) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.

Claim: 18 – Element (F)

receive other content, via the identified application-based information channel, from at least one of the additional users.

- Other content is received by the application-based information channel from at least one additional user in the form of comments and additional photographs.



<https://us.community.samsung.com/t5/Creator/Burj-Khalifa/m-p/2751579#M4937>

Original topic: Burj Khalifa

Date acquired: 2/12/2024

Claim 18, Element (F) - The Accused Products literally infringe this claim element. Alternatively, the limitations of this claim element are present under the Doctrine of Equivalents because to the extent there are any differences between the Accused Product and this claim element, such differences are insubstantial. Further, equivalency may be shown by the fact that the Accused Product performs substantially the same function in substantially the same way to achieve substantially the same result as recited in this claim element.